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COMMENTS FOR
TEXAS PUBLIC UTILITY COMISSION PROJECT #52373
SEPTEMBER 8, 2021

My name is Richard Howe. I am a native Texan, and a long-time resident of Plano, Texas. I am providing these comments for consideration for Project 52373, "Review of Wholesale Electric Market Design", in response to the PUC memo dated Sept 2, 2021.

Thank you for the opportunity to submit these comments. As an advocate for competitive free-markets, I know there have been many benefits to Texans from our competitive electricity market design. However, it is evident from the February 2021 event and prior extreme weather events (e.g. 2011), market design improvements at the boundary conditions are required.

Residential DR (Demand Response) has great potential as a dispatchable resource today and into the future. This is because we now have technology that wasn't available in the past to communicate with smart technologies in the home. I strongly encourage the PUC to develop a better framework to leverage this resource to increase electric reliability and reduce costs for all Texans. Also, because many of the resources generating electricity on our electric grid continue to release substantial greenhouse gas (GHG) emissions, improved policies that better leverage residential DR will reduce electricity demand and thereby help reduce GHG emissions.

Additionally, I want to continue repeating the importance of these two areas that should be leveraged in this review of the market design – residential energy efficiency programs and clean distributed energy resources.

1. Energy Efficiency Programs

As highlighted in this Oct 2019 report prepared for the National Association of State Energy Officials, "energy efficiency measures are the foundation of a smart, grid-interactive efficient home. They can reduce the baseline load of a home, lowering overall electricity use.... Energy efficiency provides the foundation of other solutions' effectiveness: minimizing the load size that requires shifting [in high demand periods, and] enables homes to hold a comfortable temperature for longer periods of time...". (See https://naseo.org/data/sites/1/documents/publications/AnnDyl-NASEO-GEB-Report.pdf)

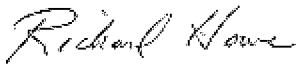
2. Clean Distributed Energy Resources

New clean distributed technologies are now available, such as local behind-the-meter solar and storage. We need to establish improved market rules to leverage the grid benefits of these resources and further incentivize private investments. This would enable greater local energy independence and resilience and expand market opportunities for distributed microgrids. Please consider information in these sources:

- The roadmap to the lowest cost grid is paved with distributed solar and storage; (https://pv-magazine-usa.com/2020/12/03/the-roadmap-to-the-lowest-cost-grid-is-paved-with-distributed-solar-and-storage/)
- 5 Ways Distributed Energy Resources are Working in Texas, Now; (https://blog.aee.net/5-ways-distributed-energy-resources-are-working-in-texas-now)

As we look again to lead the way in market-based electric grid designs for the 21st century, we must not overlook 21st century challenges. Therefore, we must equally consider and implement market design rules now that will further incentivize the reduction of greenhouse gas emissions so that we can achieve net zero emissions in the coming decades.

With Appreciation,



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